

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF INDIANA
HAMMOND DIVISION**

UNITED STATES OF AMERICA)	
Plaintiff,)	
vs.)	CASE NO: 2:23CR-00061
)	
CRYSTAL TAYLOR-HUTCH)	
Defendant.)	

DEFENDANT’S MOTION TO CONTINUE PRETRIAL AND TRIAL

Comes now the Defendant, by and through counsel, Claudia Traficante, and moves this Court for a continuance of the Pretrial and Trial and in support thereof states as follows:

1. That the above captioned matter is set for Pretrial hearing on 9/29/23 at 9:30 am and Trial is set on 10/16/23 at 8:30 am.
2. That the parties need additional time in resolving this matter short of trial.
3. That counsel has discussed the matter of the continuance with the Defendant for which she agrees that the delay in proceedings to trial occasioned by a continuance is excludable for the purposes of the Speedy Trial Act and has no objection to the continuance herein.
4. That counsel has discussed the matter of the continuance with Co-Defendant’s counsel, Attorney Sheldon and he has represented that he had discussed the continuance with his client, Nakia Hutch, for which he also agreed that the delay in proceedings to trial occasioned by a continuance is excludable for the purposes of the Speedy Trial Act and has no objection to the continuance herein.
5. That counsel is obligated to render the defendant effective assistance of counsel under the 6th Amendment to the United States Constitution and the right to effective assistance of counsel would be violated proceeding with the scheduled pretrial and trial dates.

6. That the continuance requested is not for dilatory purposes, but is requested for the reason set forth herein.

7. That the Government through AUSA, Steven Lupa, has no objection to the continuance herein.

8. That the ends of justice served by the continuance out weigh the best interest to the public and Defendant to a speedy trial, as provided by 18 U.S.C. Section 3161(h)(7).

WHEREFORE, defendant, by and through counsel, Claudia Traficante prays that this Court grant said continuance and reset this matter for Pretrial Trial and Trial on dates convenient to the Court, and for all other just and proper relief in the premises.

Respectfully Submitted by:

s/Claudia Traficante

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CERTIFICATE OF SERVICE

I certify that on the 27th day of September, 2023, the foregoing Defendant's Motion to Continue the Pretrial and Trial was sent to each party or attorney of record listed below by electronic filing on the CM/ECF system.

s/Claudia Traficante

Steven Lupa
Assistant United States Attorney
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Sheldon Nagelberg
Attorney for Nakia Hutch
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